

# NATIONAL PARKS CONSERVATION ASSOCIATION

*Protecting Parks for Future Generations*

**Testimony of  
Nathaniel Pryor Reed**

**National Council  
National Parks Conservation Association**

**Re: “National Parks of Florida”**

**before the  
Subcommittee on Criminal Justice, Drug Policy and Human Resources  
of the House Government Reform Committee  
U.S. House of Representatives**

**January 11, 2006**

Chairman Souder, it is a privilege to be here today as we examine some of the serious challenges facing America’s national parks. I want to thank you for holding these important hearings, and in particular, for visiting Florida to discuss the future of the parks here in this state.

My name is Nathaniel Pryor Reed, and I am here testifying as a member of the National Council for the National Parks Conservation Association (NPCA). Since 1919, the nonpartisan National Parks Conservation Association has been the leading voice of the American people in protecting and enhancing our National Park System for present and future generations. Today we have more than 300,000 members nationwide who visit and care deeply about our national parks.

I served as assistant secretary of the U.S. Department of the Interior for Fish, Wildlife and Parks in the Nixon and Ford administrations, and I have had the honor and privilege of serving six Florida governors in numerous positions, including Special Assistant to Governor Claude Kirk for the Environment (1967-1971). I have also been a member of the Governing Board of the South Florida Water Management District for many years. I helped found 1,000 Friends of Florida, serving as both president and chairman of the organization. In addition to my position with NPCA, I currently serve on the boards of the Everglades Foundation, the

Atlantic Salmon Federation, and the National Geographic Society. I reside in Hobe Sound, Florida and have been involved with Everglades advocacy and restoration efforts for more than 45 years. I served for many years as Vice Chairman of both the National Audubon Society and the Nature Conservancy.



1300 19<sup>th</sup> Street, N.W., Washington, D.C. 20036  
Telephone (202) 223-NPCA (6722) • Fax (202) 659-0650



PRINTED ON RECYCLED PAPER

Americans strongly support our national parks. A Harris poll released last month found that national parks topped the list of federal government services with the strongest public support (85%), ahead of even Social Security. Unfortunately, while there is a strong public support for the parks, this has not translated to a corresponding level of sustainable federal funding.

The funding challenge facing Florida's 11 national park units are comparable to those across the system's 388 units. The budgets of Florida's national parks today (FY 2006) are only five percent higher than they were three years ago (FY 2003), and are not keeping pace with inflation and other demands placed on the parks, such as the costs associated with repairing hurricane damage. Furthermore, an across-the-board cut of one percent to all federal programs was recently enacted by Congress to pay for the final FY 2006 appropriations measures and will further harm the parks.

While Florida's national parks did receive an average increase of 3.9 percent between FY 2004 and FY 2005, this barely kept pace with inflation. The following year (FY 2006) the base-operating budget increases averaged only 2.0 percent, resulting in a real decline of 1.1 percent when compared to the rate of inflation (3.1 percent). Individual park units, such as Big Cypress National Preserve, face a budget that is only 2.9 percent higher than it was three years ago, woefully inadequate to protect the park's natural and cultural resources.

Providing sufficient funding for the protection of Florida's national parks is important to the state both ecologically and economically. Florida's national parks not only provide important recreational opportunities for local residents and visitors of south Florida, but also boost the region's economy. In 2003, a conservative estimate of 490,000 visitors to Biscayne National Park spent approximately \$23.3 million and supported 426 jobs in the local economy.

Other research has shown an estimated \$12 billion of output (income, tax revenue) directly related to Biscayne Bay's recreation, commercial fishing, and shipping. In October 2005, the *Miami Herald* reported that the total economic value of commercial fishing in Florida is \$1.2 billion a year, while recreational fishing expenditures are \$8.3 billion (including everything from food, lodging, bait, charter, equipment and gas). The fish nurseries of Biscayne and Everglades national parks play a large role in this economic engine.

### **The Poor State of Florida's National Parks**

NPCA's Center for State of the Parks program began assessing the condition of natural and cultural resources in the parks six years ago. Two recent assessments of Biscayne National Park and Florida Bay found that the parks' natural and cultural resources suffer largely as a result of funding and staffing shortfalls.

### **Biscayne National Park**

Biscayne protects part of the third-largest coral reef system in the world and the longest stretch of mangrove forest remaining on Florida's east coast, providing habitat and nursery grounds for most of the region's important commercial and recreational fish. Biscayne is home to at least 16 threatened or endangered wildlife species. The park also houses an abundance of

historic structures and archaeological resources, including at least 44 shipwrecks, telling of the people who visited or lived in the region before the park was established.

Unfortunately, Biscayne's base budget has increased by just 2 percent in absolute dollars since 2001. This funding shortfall has had significant consequences for the park. Biscayne's coral reef is in trouble; fish populations are declining; and the quantity, quality, timing, and distribution of fresh water flows—critical to the health of regional ecosystem—are changing. Compounding these problems are development pressures, a result of Biscayne National Park being the closest national park to the burgeoning Miami-Dade County metropolitan region. The

park is primarily a marine park, which brings additional challenges such as illegal immigration and smuggling. These conditions, combined with visitation levels that have increased about 56 percent since 1993, create challenges for Biscayne's limited law enforcement staff. According to a 2003 rating by the National Park Rangers Lodge of the Fraternal Order of Police, Biscayne is the sixth-most dangerous park for law enforcement rangers.

NPCA's comprehensive resource assessment rated overall conditions of Biscayne's known natural resources 58 out of 100, which is a "poor" score. Overall conditions of the park's known cultural resources rated only 48 out of a possible 100, also indicating "poor" conditions.

Funding and staffing shortfalls make it difficult to properly protect the park's resources. One telling example of the funding shortfalls is that there is only one curator managing the museum collections of Biscayne National Park, Big Cypress National Preserve, Dry Tortugas National Park, and Everglades National Park. These collections include more than 4.5 million items; 93 percent of Biscayne's more than 700,000 items are not catalogued and inaccessible to visitors and researchers.

## **Florida Bay**

Approximately one-third of Everglades National Park's 1.5 million acres encompasses a special place called Florida Bay, a marine lagoon that is home to the most significant breeding grounds for wading birds in North America. Florida Bay provides habitat for a diverse collection of marine animals, including numerous federally listed threatened and endangered species, and is part of the largest preserved mangrove system in the Western Hemisphere. The Bay is also a world-class destination for recreational anglers, and the park supports habitats and nurseries for commercial fishing in the waters bordering Florida Bay.

Operating budget deficiencies create challenges at Everglades that hamper its ability to enforce necessary regulations in Florida Bay and protect park resources. The park's operating budget has increased an average of approximately three percent each year for the past five years—far from keeping pace with increased costs. This had led to significant staffing shortages in key areas, such as science and law enforcement.

For instance, in 2005, Everglades National Park had a total of only 12 full-time law enforcement rangers to patrol the 444,790-acre Florida Bay. According to the most recent law enforcement needs assessment (completed in 2003) by Everglades National Park, there is a 30 percent shortfall in the total number of rangers needed to adequately staff the park. Without adequate numbers of law enforcement personnel, the park is unable to effectively prevent illegal

poaching and trespassing on closed islands, illegal entry into backcountry area by boats that violate no-motor or no-entry restrictions, and damage to shallow underwater communities that occur from groundings. In conjunction with an increase in law enforcement personnel, Everglades National Park needs to have the means to better educate park visitors about appropriate activities and safe boating in Florida Bay's challenging waters.

### **Protection is Easier and Less Costly than Restoration: Lessons from America's Everglades**

America's Everglades are a clear example of the need to err on the side of preservation of our natural resources. Mistakes we have made in the past demonstrate that if we do not prioritize the protection of our national treasures when we have the chance, we are likely to face much more costly and difficult restoration scenarios in the future. In the Everglades, we are learning that successful restoration requires sustained financial commitment, as well as results-oriented leadership. Authorized only five years ago, Everglades restoration is already hindered by delay and a lack of funding. Today's Congress should avoid repeating the mistakes of the past by approving the critical projects and the necessary funding that will reverse the damage of so many years of misguided management and help protect the national parks of South Florida by giving the restoration process the resources, oversight, and priority it requires to be successful.

Wetland drainage projects for urban and agricultural development have altered the hydrology of the Everglades ecosystem and the entire South Florida landscape. While the Comprehensive Everglades Restoration Plan (CERP) is designed to create a more natural hydrologic condition in south Florida, chronic implementation delays subject the region to continued degradation.

When Congress authorized CERP in 2000, it launched the largest ecosystem restoration program in history and codified a unique state-federal implementation partnership. Congress must provide adequate funding to fulfill the federal government's role in that partnership. The federal investment in CERP is focused on the restoration and preservation of the parks, refuges and other federal lands in the region and Americans expect this investment to be protected. Providing adequate funding for the Park Service to participate in these activities is critical. Unfortunately, what we have seen since the Congressional authorization of the CERP in 2000 is that the federal government's role has substantially diminished, particularly with respect to the appropriations of sufficient funding and authorization of the first few projects. I urge the Committee to focus attention on the need for a renewed and reinvigorated commitment on the part of the federal government to provide dollars and leadership for restoration.

### **Adequate Funding and Congressional Leadership Are Required for Smart Decisions in the Everglades**

Congress must provide leadership and funding to ensure that decisions are results-oriented and that the right decisions are made now rather than later. A perceived lack of Congressional attention and priority can doom a program like Everglades restoration to equivocation, delay, and expedient but ineffective decision-making. A good example of this

phenomenon is unfolding within a specific restoration project critical to restoring Everglades National Park.

For lack of funding, the Administration is now focused on substituting a bargain approach in place of the best approach to the "Modified Water Deliveries Project" (ModWaters), a project that would restore sheet flow to the Everglades. For example, 11 miles of the Tamiami Trail (U.S. 41), which acts as a dam across the center of the Everglades, will be altered as part of ModWaters. The best long-term approach to these modifications is to elevate this stretch of highway to an 11-mile bridge or Skyway, removing it entirely as an impediment to sheet flow. Yet, this skyway alternative is no longer being considered as an option for this project because of an anticipated lack of available funding. Congress could change this dynamic by resolving to fund the best solution to Tamiami Trail now, as opposed to funding a

partial fix that may require more costly retrofitting in the future. The Administration is proposing an approach for Tamiami Trail which will cost half as much as the Skyway, but will produce less than half the benefits to the Park and the entire Everglades.

NPCA believes that the best available science should be used to guide restoration efforts so that maximum protection for park resources is achieved. NPCA further believes significant funding is critical to meet this effort. This year, Congress met the president's request for the largest appropriation to date for ModWaters (\$60 million) and I and NPCA thank you for that. However, in order to meet the intended goals of restoring America's Everglades, more funding is needed for this and other projects. Today, we urge the Park Service and the Army Corps of Engineers to make the best choice and choose the Skyway and we ask this Committee and all of Congress to guarantee adequate funding for the Skyway. This represents long-term and permanent benefits for the park and the entire Everglades ecosystem.

### **Congressional Leadership is critical to protecting federal resources**

Oversight of Everglades restoration projects is a critical element to ensuring the parks receive the promised benefits. For example, the modifications to the C-111 canal, as proposed in 1994, required a swap of increasingly rare marl prairie lands from Everglades National Park for more common wetlands owned by the State of Florida. The purpose of this land swap is to create buffer areas that will maintain water levels in the wetlands of the park while providing the required flood protection for the agricultural areas to the east.

Unfortunately, these buffer areas may be used to further impair the resources of the park by increasing flood protection benefits through delivering potentially polluted storm water directly into the park. The appropriate oversight is needed to ensure that C-111 funding, including the national park land provided for this project, will be used for the benefit of the park and the assets of the Everglades.

Project delays often result in significant cost overruns, especially in massive undertakings like Everglades restoration. Unfortunately, authorization for the first two restoration projects, Indian River Lagoon and Picayune Strand, still await Congressional action. Without Congressional authorization of these projects, funding them will become a moot point,

as will the restoration of the south Florida National Parks. By increasing Congressional oversight and attention to Everglades restoration now, Congress can put the plan back on schedule and on budget.

The bureaucracy of the Corps' processes compounds the delay of these two projects as well as the entire restoration plan. Congress needs to focus its attention on modernizing the Corps so that the agency can fulfill its responsibility to the Everglades restoration effort and efficiently implement environmentally sound projects that will meet the greater Everglades ecosystem's needs.

Federal appropriations to fund these and other critical projects, particularly those authorized in the Water Resources Development Act of 2000 (WRDA 2000), should be increased to allow for the advancement of project planning and implementation.

### **Hurricanes Cause Extensive, Expensive Damage in National Parks**

In 2004, Hurricanes Charley, Frances, Ivan, and Jeanne dominated the headlines. Florida's national parks were hit hard by the hurricanes, with hurricane Charley causing extensive damage to Dry Tortugas National Park in August. Later, Hurricane Ivan caused \$30 million in damages at Gulf Islands National Seashore in Florida and Mississippi—washing out several miles of roads, flooding historic buildings, a visitor center, and parking lots, and destroying pavilions. In addition to infrastructure damage, storms can wipe out fragile habitat for protected species, damage that is not easy to put a price tag on. Hurricanes Frances and Jeanne wiped out nearly 1,400 sea turtle nests at Florida's Canaveral National Seashore (one of the few beaches in the eastern United States where the turtles can safely lay eggs), and affected fragile dunes that are home to several endangered species such as the gopher tortoise.

In 2005, tropical storms Arlene and Cindy, and hurricanes Dennis, Katrina, Rita, and Wilma severely affected national parks in Florida and along the Gulf Coast. Dry Tortugas National Park was impacted by heavy winds and storm surge that damaged docks, knocked out a portion of the seawall, destroyed a historic cannon, and damaged the park's communication, water collection, and electrical services.

Everglades National Park was also hit hard, when a five-foot storm surge caused significant damage to the concessions marina, boat fleet, employee housing, and government vehicles, and forced the closure of the entire Flamingo complex; some portions may never reopen. The estimated damage to the park from the hurricane is \$7.6 million. A recent *Miami Herald* editorial exemplified the local frustration and reduced tourism dollars that a permanently closed Flamingo lodge would have on Everglades National Park. Other areas of the park experienced heavy flooding, such as Shark Valley, where the tram was taken out of service and portions of the roadway had to be closed.

Lastly, Gulf Islands National Seashore, which hadn't recovered from Hurricane Ivan in 2004, received extensive damage in 2005. Large portions of the park's Florida and Mississippi districts were closed due to the devastation brought by Hurricane Katrina, including barrier islands, visitors centers, and campgrounds. For some portions of the park there is still no estimated opening date.

NPCA's 2005 report, *Faded Glory: Top 10 reasons to reinvest in America's National Park Heritage*, raised the issue about whether national parks have adequate funding and staffing to prepare for and recover from weather emergencies. The Park Service's fiscal year 2004 budget included only \$3 million to address emergency needs in the parks, which proved woefully inadequate considering the Park Service's own estimates that the 2004 storm damages exceeded

\$50 million system-wide. The total Park Service damage and response costs (exclusive of Federal Highway Administration funding needs and natural resource restoration needs) from 2005 storms were estimated at approximately \$67 million.

While Congress and the Administration provided \$48.9 million for cleanup and repairs in affected areas of the National Park System in 2004, such funds were not readily available to the parks in 2005. The Department of the Interior was originally slated to receive \$38 million to cover construction costs associated with hurricanes Katrina and Rita, but the administration's rescission request to Congress cut \$34 million in construction funding that was already allocated to the Park Service. As a result, it is a real possibility that necessary park construction will not be funded. For example, projects to rebuild washed out docks, visitor centers, and historic sites may be delayed or eliminated.

When examining hurricane impacts on our parks it is also important to remember the backdrop of the Park Service's current fiscal realities. The Park Service currently has a deferred maintenance backlog that is estimated to be between \$4.5 billion and \$9.7 billion and an operating shortfall in excess of \$600 million annually. And like many other federal agencies, the Park Service does not adequately budget for natural disaster contingencies. Therefore, much of the storm clean-up costs come at the expense of other needs in an already-tight budget, since supplemental disaster appropriations by Congress rarely address the full menu of restoring costs.

Hurricanes also compound the problems associated with staff shortfalls. In addition to shuffling staff internally, staff from other parks, often superintendents and law enforcement personnel, are commonly re-assigned to help with hurricane disaster relief in affected parks. This leaves a void at their home parks where staff are already stretched thin, and in essence has a domino effect, creating a strain on those parks that are loaning their staff, sometimes for lengthy periods of time. In one example, a drug bust in Sequoia and Kings Canyon National Park had to be conducted without the chief ranger and other key staff who were out on detail for hurricane relief efforts in the Gulf region. The Park Service's funding shortages, coupled with staffing shortfalls, makes the impact of hurricane season all the more damaging and extends the impact long after a storm passes.

Congress and the administration need to take the appropriate actions to address the needs of damaged parks. They should adequately budget for natural disaster and consistently reimburse the Park Service for necessary repairs resulting from the frequent acts of nature that besiege our parks. If not addressed promptly, the effect of the storms will compound the ever-growing backlog facing our magnificent parks. This creates a situation where everyone loses. The parks can't complete their mission to protect the great cultural and natural resources for future generations. And the American people lose out on their right to visit and enjoy their parks in a manner in which they have rightfully come to expect.

### **Invasive Species Overrun Parks**

In October of 2005, Everglades National Park was the subject of international media attention for an unusual reason: An invasive 13-foot Burmese python exploded after attempting

to eat an American alligator, a native to the Everglades. This is a shocking example of the severe problem caused by invasive, exotic species in Florida's national parks. While this occurrence was unusual, invasive species in the parks are not.

The introduction of exotic animals and plants into south Florida began in the late 1800s and has escalated ever since. Originally introduced as pets, food sources, ornamentals, or as biological controls, invasive species have become extremely difficult to eradicate.

In Florida there are more than 60 species of invasive, non-native plants that have altered native plant communities and caused ecological damage; the three most prevalent in south Florida are malaleuca, Australian pine, and Brazilian pepper plants. These plants threaten the native cypress trees and mangroves found in Florida's national parks.

In addition to exotic plants threatening park resources, non-native mammals also cause problems in Florida's national parks. Feral hogs are found in Everglades and Biscayne national parks. These hogs threaten native wildlife and alter the forest habitat. Additionally, non-native amphibians, reptiles, and fish also threaten the natural habitat and native animals found in Florida's parks. The invasion of exotic fish from Africa and South America, for example, is causing the decline in the populations of popular native sport fish, such as the largemouth bass.

In December 2004, *Smithsonian* magazine reported "several thousand foreign plant and animal species have colonized the United States. All told, invasive species cost the nation upwards of \$140 billion a year."

A commitment to resource protection in the parks is crucial in order to save the native landscapes that make the parks so distinctive. To this end, we encourage the Administration and Congress to continue, and increase financial support for the Park Service's *Natural Resource Challenge*.

The Natural Resource Challenge was established in 1999 to strengthen funding for natural resource management in the parks, and today, provides funding for research and control of invasive species, among other important projects. Unfortunately, the Natural Resource Challenge, like many aspects of the Park Service's budget, is significantly under funded. In Fiscal Year 2002, the program received \$20 million; in Fiscal Year 2005, this amount was reduced to only \$5 million. We strongly support the National Parks Centennial Act, which includes increased funding for the Natural Resource Challenge.

### **The Role of Partnerships in Park Preservation**

Increasing federal funding for our national parks is critical to the long term health and success of "the greatest idea our country ever had." If used to supplement federal appropriations, private funding can play an important role in improving our parks.

One example of a successful partnership is that of the South Florida National Parks Trust, a project of the National Park Foundation, which was founded to "improve the quality of life in South Florida by supporting the national parks that define our landscape and enrich our culture—Everglades National Park, Biscayne National Park and Dry Tortugas National Park in the Florida Keys."

The Trust has provided support for several key park projects, among them: the production of more than 25,000 maps of Biscayne National Park to educate boaters on how to safely navigate the park waters, and the purchasing of channel markers for Florida Bay to help guide boaters in Everglades National Park and protect the bay's critical habitat. The Trust has also



enabled thousands of school children to explore the Everglades and Biscayne Bay during field trips and overnight camping excursions.

As budgets have tightened, parks have become increasingly reliant on such private philanthropy. Cutbacks in funding for Everglades National Park's education program would have denied thousands of visitors the opportunity to enjoy educational ranger-led programs, if not for funding from the Trust. It is disconcerting that the park has been forced to rely on the Trust to provide the necessary funds for its environmental education, which is arguably one of the national park's most important roles—educating our future generations about their world.

In another example, the Trust is helping underwrite an effort to save and restore the Civil War-era cannons at Fort Jefferson in Dry Tortugas National Park. Unfortunately, recent budget allocations have been insufficient to provide Dry Tortugas with the necessary funding to support a full-time dedicated cultural resource specialist. Again, Congress and the Administration have not matched the investment made by the private sector.

I am very worried that the private sector will start to see itself as supplanting, rather than supplementing, funding for our parks. This could easily be interpreted by the public as a signal of a lack of support for our parks by our political leaders. As a result, those philanthropists could retreat and pull back their funding. Partnerships are very valuable relationships based upon trust and a belief on the part of many in the community that the parks unique cultural and natural resources will be preserved and protected. Not demonstrating a real and ongoing financial commitment to our national parks risks losing some of that hard-earned trust. If we are to be successful, we must work cooperatively to protect and enhance our national parks for this and future generations.

### **Land Acquisition is Critical to Park Preservation**

Development and urban sprawl have long been identified as a threat to national parks in Florida. One way to address the threat of development is to establish a buffer between the park and adjacent development to provide safe ground for wildlife, for instance. But across the park system, and in Florida in particular, many park restoration and protection projects intended to help ensure a park's integrity are threatened by a lack of funding for land acquisition.

This year, Congress provided merely \$45 million to the National Park Service for federal land acquisition, approximately \$10 million less than was provided the previous year. This shortfall comes at a time when the Park Service shows a Land and Water Conservation Fund (LWCF) acquisition backlog for in holdings at Big Cypress, Biscayne, Everglades, and Gulf Islands National Seashore at over \$138 million. In addition, the in holding backlog at Virgin Islands National Park alone is nearly \$50 million.

While the federal commitment to land acquisition has significantly decreased in recent years, the need has not. Within the past decade, state and local officials have initiated major land acquisition programs, including the Florida Save Our Rivers (SOR) program and Miami-Dade County's Environmentally Endangered Lands (EEL) program. These programs have identified lands adjacent to park boundaries as environmentally important lands to acquire.

## **The Comprehensive Everglades Restoration Project Land Acquisition Needs**

The integrity of the Comprehensive Everglades Restoration Project (CERP) rests in very large part on the ability to acquire the land necessary to implement project components. Unfortunately, as the Everglades awaits further Congressional action and Administration support, land values skyrocket; development pressures increase, and major opportunities to acquire lands that are critical to the restoration of South Florida's national parks are lost. Currently, two CERP projects (C-111 Spreader Canal and the Biscayne Bay Coastal Wetlands) that will benefit Biscayne and Everglades national parks are critically dependent on the Land and Water Conservation Fund (LWCF) and other means of funding. The C-111 Spreader Canal project will provide the single most significant restoration benefit for Florida Bay of any CERP project, yet its success is threatened by a lack of funding for land acquisition. The purpose of the project is to remove the canal primarily responsible for disrupting freshwater flows through Manatee Bay and Barnes Sound to Florida Bay, while maintaining flood protection for agricultural and urban areas.

An additional objective is to rehydrate the coastal wetlands between Everglades and Biscayne national parks by "spreading" the water more naturally to reestablish wetlands in the "Southern Glades" and "Model Lands" of southern Miami-Dade County, and to push the saltwater intrusion line back toward Florida Bay. The original project proposed to acquire over 12,000 acres of land, mostly existing wetlands. This project is included in the originally authorized projects of WRDA 2000, but has lingered with the delays of ModWaters.

Last year, I was pleased to learn that Governor Jeb Bush included this entire project in his "Acceler8" plan—a plan intended to infuse Everglades restoration with a burst of funding at the start—particularly because the Congressional dollars have been slow to materialize. Unfortunately, just last month, it became public that the state's proposed plan no longer includes backfilling this destructive canal and that the new spreader canal's alignment would not restore as many acres of wetlands, all for one main reason: no money to acquire land. The state proposes to reduce the benefits of this project because of a lack of money to buy land, and will not await the Army Corps of Engineers' process to determine the best plan.

As a former member of the South Florida Water Management District Governing Board, I understand the financial limitations of the agency and therefore do not place all of the blame for this decision on them. The problem also lies with the bureaucracy of the Corp's internal evaluation, which requires long overdue changes. Action is needed immediately or the Corps will lose the opportunity to apply their new tactics for environmentally sound projects.

With increased funding and oversight for this project from the federal government, we could be assured of the success of this project. However, without the land purchases needed, water quality treatment will be eliminated, the extent of wetland restoration will be reduced and Florida Bay will continue to suffer. This outcome is unacceptable.

Given that the C-111 Spreader Canal project will provide Florida Bay with the most benefits of any CERP project, the federal government should provide funding for the National Park Service to acquire the land. Congress could propose to acquire these lands as it did for the East Everglades Expansion Area by including it into Everglades National Park, by creating a

new National Park unit, or making it a state wildlife management area. As the primary purpose of the federal government's role in this process is the restoration of federal-managed lands, Congress bears the responsibility to ensure that the original goals of the project are met. The Administration should be calling upon Congress to fulfill its promise to restore America's Everglades.

### **Biscayne Bay Coastal Wetlands Could Restore Biscayne National Park**

Development pressures in Miami-Dade County also threaten the success of the "Biscayne Bay Coastal Wetlands" (BBCW) project. This land acquisition dilemma will prove detrimental to the resources of Biscayne National Park without action by Congress.

NPCA's 2006 State of the Parks assessment of Biscayne National Park highlights the critical need for the success of the BBCW project, which would divert canal flow through coastal marshes and creeks and help re-establish productive nursery habitat along the shoreline; stabilize a persistent estuarine zone, and reduce abrupt freshwater discharges that damage fish and other invertebrates in the Bay.

The report also details the historical context of lost land and encroaching development as the single largest threat to the restoration of the park and Bay. Over 13,000 acres of land (estimated at over \$50 million) were slated to be purchased for this project to provide storage and treatment for water that would be redistributed across the coastal wetlands and flow more naturally into the Bay. Another 30,000 acres of land, mostly existing wetlands, would realize increased benefits from this and the C-111 Spreader Canal projects, in concert with other county and state programs seeking to purchase these lands.

Regrettably, a permit has been granted to one of the nation's largest developers for a 500-acre development to be constructed in the footprint of the BBCW project. Without an increased level of participation by the federal agencies and the necessary land acquisition funds to accompany that activity, restoration efforts are stalled and threatened.

### **Funds Needed to Keep Virgin Islands National Park Intact**

Not too far away from Florida is Virgin Islands National Park (VIIS) in the Caribbean. This park consists of approximately 10,000 acres, of which 2,000 acres are non-federal land in holdings. One such in holding, the 441-acre Maho Bay Estate Parcel, was recently divided into 11 interests as part of an inheritance. If Congress doesn't provide funding, the property stands to be taken over entirely by a developer, which would divide the national park permanently.

For lack of funding, the Park Service has only three of the 11 pieces of property, or interests, in the 441-acre estate. A land trust was able to acquire one parcel. A developer acquired six of the parcels, and has approached the Park Service and the private land trust and encouraged them to sell their holdings. There is great concern on the island that aggressive development could occur on the Maho Bay estate, which would divide the park in half and compromise public access to the Maho Bay beach area. Without adequate land acquisition funding, special places like Virgin Islands National Park may not exist for our children to enjoy.

### **Timucuan: A Model of Success**

Congress can help to preserve our national parks. U.S. Representative Ander Crenshaw secured land acquisition funding that expanded the boundary of the Timucuan Ecological and Historic Preserve to include 8.5 acres of culturally and historically significant land in Nassau County, Florida.

Timucuan has within its boundaries federal, state and city parklands, as well as land owned by more than 300 private landowners. The congressionally authorized and funded expansion of the Preserve's boundary included an 8.5 acre parcel of land adjacent to American Beach, which, when purchased by a prominent African-American businessman in 1932, was the only racially integrated beach in Florida, and one of the few in the Nation. American Beach has been designated by the Florida Commission on African-American History as a site on the Florida Black Heritage Trail. In 2004, the Amelia Island Plantation arranged to donate the land adjacent to American Beach to the Park Service. The property was not currently within the congressionally authorized boundary of the Timucuan Ecological and Historic Preserve so Representative Crenshaw's legislation expanded the boundary of the Preserve to include these donated lands.

While this is a great step forward for Timucuan, this park was fortunate to have the ear of a supportive, interested, and influential member of Congress. Unfortunately, many parks across the country do not have this luxury and are not receiving the necessary funds for critical land acquisition—affecting the protection of our heritage and our American stories.

### **Management Policy Revisions Should Be Abandoned**

Preservation is about more than funding the needs in our parks; it is also about managing our national heritage with the interest of future generations in mind. The much-publicized rewrite of the National Park Service's management policies could undermine this effort. Individually and cumulatively, these contemplated changes would alter the Park Service's interpretation of its mission and of the fundamental purpose of the National Park System.

The 2001 edition of the Park Service's Management Policies gave a very detailed and clear articulation of how to interpret the 1916 Organic Act's mandate "to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same unimpaired for the enjoyment of future generations." In contrast, the new draft significantly muddies the waters, and has the effect of letting each manager judge for him/herself whether a particular use or form of enjoyment is appropriate or not, and will or won't cause impairment, without the clear guidance that the 2001 edition of Management Policies provide.

By all accounts, including the aforementioned Harris poll and even Park Service-commissioned visitor surveys, the hundreds of millions of people who visit the parks annually enjoy these parks. But the proposed changes to the Management Policies would make it more difficult for park managers to prohibit some types of damaging uses. The changes lower the standard by which appropriate uses are judged, by adding a variety of qualifiers, modifiers, and

vague, fuzzy guidelines to what were previously much more clear guidelines for judging appropriateness.

We question the urgency with which the Department of the Interior has been pursuing these extensive modifications to the management policies of the Park Service, which were last modified only five years ago.

Over the past 25 years, the Park Service's fundamental management policies have been revised only twice: in 1988 during the Regan Administration and in 2001 at the end of the Clinton Administration. Both versions underwent extensive professional review and were issued to the public for comment for extended periods, and both were identical in their interpretation of the meaning of the key language in the Organic Act.

For those narrow subjects that the Administration has asserted were not addressed in the 2001 edition (homeland security, cell towers, succession planning, etc.) the issuance of specific Director's Orders is the operative process already in place to address any need. Re-writing the entire set of policies is completely unnecessary.

For these reasons, NPCA strongly opposes, and urges the Department of the Interior to abandon, the proposed management policies rewrite.

With the Park Service so strapped for resources at this time, it should only be required to engage in such a process, with significant fiscal and policy ramifications, if it is absolutely

necessary. What is needed is for the broad constituency of interests that are engaged with the National Park Service, including recreation and tourism industries, gateway communities, conservation and preservation organizations, and American citizens, to step up their support for their national parks as they are, and as they are intended to be: Preserved unimpaired for future generations to enjoy.

Special interests must give way to the national interest if the national parks are to flourish in the future.

### **Management Policy Changes Could Undermine Everglades Restoration Efforts**

As America invests in Everglades restoration, it invests in our future, demonstrating that we can act to save the natural systems that sustain us, allowing human beings and ecosystems to thrive side by side for generations. This progress must be sustained. The Park Service is mandated to manage park resources to protect and enhance them for those future generations.

Unfortunately, the proposed changes to the Management Policies may have the effect of undoing the hard-fought, yet necessary, benefits to these federal lands. By introducing terms such as "mitigation" of impacts to these policies, the Park Service potentially creates future scenarios where we find ourselves cleaning up damage done rather than avoiding it in the first place. The need for Everglades restoration teaches us that this philosophy costs too much.

In all fairness to the federal taxpayer, we must consider the obligations the federal government has to preserving our national treasures. Of critical importance to Everglades restoration is the improved quantity, quality, timing and distribution of water flows through the ecosystem. Competing interests for water supply for the burgeoning population in south Florida may force the hands of State water managers to find additional resources for those needs. While Everglades restoration is intended to increase the total available water supply, the changes to the Water Rights section of the Management Policies could weaken the park's position by requiring them to "cooperate," which could force park managers to compromise with state officials, rather

than to “protect” the resources’ needs for water supply. After having spent such significant amounts of money to revitalize a dying ecosystem, such changes would be destructive.

As identified previously, invasive species are a major threat to the restoration and maintenance of natural conditions within south Florida’s national parks. Slight word changes to the existing Management Policies would potentially allow the devastating invasions of Australian pine or Brazilian pepper trees to become acceptable. With the continued infestation of these invasive species, other wildlife populations would continue to decline, at the same time as we are implementing radical changes to improve the conditions through Everglades restoration.

## **Conclusion**

In ten years, we will be celebrating the 100<sup>th</sup> birthday of the National Park System. What better way to celebrate than to make a strong commitment to our national treasures and invest in their future today. The national parks here in Florida, and across the country, inspire and educate millions of visitors every year. The parks protect our nation’s most prized natural and cultural assets. We must provide the dedicated men and women of the Park Service the resources the need to protect our national heritage. Thank you Mr. Chairman for your commitment to do just that. I am happy to answer any questions.

# NATIONAL PARKS CONSERVATION ASSOCIATION

*Protecting Parks for Future Generations*

## Florida National Parks Operations

	FY 2003	FY 2004	FY 2005	Increase	%	FY 2006	Increase	%	Change	%
NPS Unit	Enacted \$	Enacted \$	Estimate \$	FY 04- FY 05	Increase	Request \$	FY 05- FY 06	Increase	FY 03-FY 06	Change
Big Cypress National Preserve	5,272	5,243	5,338	95	1.8	5,431	93	1.7	159	2.9
Biscayne National Park	3,456	3,434	3,531	97	2.7	3,594	63	1.8	138	3.8
Canaveral National Seashore	2,219	2,212	2,411	199	8.3	2,411	0	0	192	8
Castillo de San Marcos National Monument & Fort Matanzas National Monument	1,416	1,413	1,483	70	4.7	1,512	29	1.9	96	6.3
De Soto National Memorial	473	487	500	13	2.6	508	8	1.6	35	6.9
Dry Tortugas National Park	1,286	1,276	1,311	35	2.7	1,349	38	2.8	63	4.7
Everglades National Park	13,860	14,038	15,086	1,048	6.9	15,528	442	2.8	1,668	11
Fort Caroline National Memorial & Timucuan Ecological and Historic Preserve	1,860	1,775	1,824	49	2.7	1,877	53	2.8	17	1
Gulf Islands National Seashore	5,965	5,939	6,105	166	2.7	6,289	184	2.9	324	5.2
<b>TOT</b>					3.9			2.0		5.5



1300 19<sup>th</sup> Street, N.W., Washington, D.C. 20036  
 Telephone (202) 223-NPCA (6722) • Fax (202) 659-0650